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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEPH H.  
MARGOLIES IN SUPPORT OF GOOGLE  
LLC'S ADMINISTRATIVE MOTION TO  
SEAL PORTIONS OF THE PARTIES'  
JOINT EXHIBIT LIST**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

1 I, Joseph Margolies, declare as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for  
3 Defendant Google LLC (“Google”) in this action. I make this declaration of my own personal,  
4 firsthand knowledge, and if called and sworn as a witness, I could and would testify competently  
5 thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s  
7 Administrative Motion To Seal Portions of the Parties’ Joint Exhibit List (Dkt. 1054-1). In making  
8 this request, Google has carefully considered the relevant legal standard and policy considerations  
9 outlined in Civil Local Rule 79-5. Google makes this request with the good-faith belief that the  
10 information sought to be sealed consists of Google’s confidential and proprietary information and  
11 that public disclosure could cause competitive harm.

12 3. I have reviewed the Joint Exhibit List, and based on my review, there is good cause  
13 to seal the following information, for the reasons identified in the table below:

Document(s) to be Sealed	Basis for Sealing
<p>14 Joint Exhibit List</p> <p>15 Highlighted portions at pp. 1–3,</p> <p>16 6–26, 28–29, 38–41, 63–64</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding sensitive features of Google’s internal systems and operations, including various types of Google’s internal projects, identifiers, data signals, source code files, and logs, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>

27 4. Google does not seek to redact or file under seal any of the remaining portions of the  
28 Joint Exhibit List not indicated in the table above.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
2 and correct.

3 Executed in Bayside, Wisconsin on November 8, 2023.

4 By /s/ Joseph Margolies  
5 Joseph Margolies  
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